

QUADRINO
SCHWARTZ

666 Old Country Road | 9th Floor | Garden City, NY 11530
Phone: 516.745.1122 | Fax: 516.745.0844

Attorneys At Law

The Woolworth Building | 233 Broadway | 5th Floor | New York, NY 10279
Phone: 212.608.5445

www.quadrinoschwartz.com

Richard J. Quadrino | Evan S. Schwartz | Michail Z. Hack^{0**}
Harold J. Levy^{0**} | Scott M. Harrigan⁰

⁰ Counsel ^{**}Admitted in NY and NJ

Reply To:
Garden City Office

December 26, 2014

via Electronic Case Filing

Hon. Paul A. Crotty, USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

**RE: D'Alessandro v. OneBeacon Ins. Co.
Docket No. 14-CV-8867 (PAC)**

Dear Your Honor:

We represent plaintiff Dennis D'Alessandro in the above matter. We write in accordance with Your Honor's Individual Practice Rules and Rule 13.1 of the ECF Rules and Instructions. Defendant OneBeacon Insurance Company ("OneBeacon") is the company with the first excess layer of coverage concerning the matter before the Court. We are advised by OneBeacon that the primary coverage is exhausted, and that OneBeacon's first excess layer is also exhausted. Due to that fact, we anticipate that OneBeacon will be dismissed from this action and that the entire action will possibly be dismissed in the near future.

At present we request, on behalf of OneBeacon, and consent to, an extension in its time to answer our Complaint, from the current date of December 4, 2014, to a new date of January 20, 2014. This would coincide with the current deadline for defendant Iron Starr Excess Agency Ltd., to answer. No prior application for any extension concerning OneBeacon, or concerning the relief requested herein, has been made.

We appreciate the Court's consideration of this matter.

Very truly yours,
QUADRINO SCHWARTZ

By:


Harold J. Levy

cc: Thomas Judge, Esq. (via Email)
Martin Leif Eide, Esq. (via ECF)